Kenneth L. Neeley, 025899 1 Chris Dutkiewicz, 024962 2 Nicholas T. Van Vleet, 026933 Dane Paulsen, 029225 3 Daniel Taylor, 032094 NEELEY LAW FIRM, PLC 4 2250 E. Germann Rd., Suite 11 5 Chandler, AZ 85286 Phone: 480.802.4647 | Fax: 480.907.1648 6 Email: ECF@neeleylaw.com 7 Attorney for Debtor UNITED STATES BANKRUPTCY COURT 8 DISTRICT OF ARIZONA 9 Chapter 13 In re: 10 ARICK DUNCAN DOMBROWSKI, Case No.: 4:16-bk-08181-BMW 11 Debtor. **OBJECTION TO TRUSTEE'S MOTION** 12 TO DISMISS FOR DELINQUENT PAYMENTS AND NOTICE OF INTENT 13 TO UPLOAD ORDER WITHOUT HEARING 14 15 Arick Duncan Dombrowski ("Debtor") by and through his attorney of record in the above 16 captioned Chapter 13 Bankruptcy, Debtor Objects to the Trustee's Motion to Dismiss for 17 Delinquent Plan Payments and Notice of Intent to Lodge Order Dismissing Case Without a 18 Hearing. The Debtor made a payment on June 26, 2019 and will make the July payment this 19 week. Debtor is committed to completing his Chapter 13 Plan. 20 **WHEREFORE**, the Debtor requests that this court deny the Motion to Dismiss Case. 21 DATED: July 19, 2019 NEELEY LAW FIRM, PLC 22 /s/ Kenneth L. Neeley Kenneth L. Neeley 23 Christopher J. Dutkiewicz 24 Nicholas T. Van Vleet Dane Paulsen 25 **Daniel Taylor** Attorneys for Debtor 26 27 28

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ne foregoing served via email y of July, 2019 upon: Kerns, Chapter 13 Trustee rustee.com *laloney*